



The following are CDM's comments on the HASP prepared by MWH to support the OU3 Phase 1 Sampling efforts:

- Section 1.0** Introduction: Paragraph 1 states the plan is for MWH employees only and not for Grace or Grace's other contractors. Will Grace and/or its subs be present on the mine during the execution of the SAP this fall? If so, will Grace need to submit their own HASP? What about subcontractors to MWH - will they also be submitting their own HASP?
- Section 2.0** Paragraph 2, Page 5 states no respiratory protection is needed for work beyond ridgeline of Grace's property boundary. This statement is inconsistent with statement in Section 8.1 Paragraph 4 that says bark samplers outside the mine property shall wear half-face respirators. Also, there is a statement that no respiratory protection beyond the ridgeline is needed based on stationary air monitoring data gathered during Sept 2007. CDM would recommend that this decision be based on a negative exposures assessment using personal air samples collected during each sampling task - it has been observed at the site the stationary air monitors underestimate personal exposure levels.
- Section 3.2.5** Site Visitors: CDM would recommend that all site visitors be required to attend an H&S Primer/Briefing prior to going within the exclusion zone at the mine.
- Section 3.2.6** Accident Reports: All accidents and incidents should also be reported in writing to either the Volpe representative, the EPA representative or the lead project H&S officer
- Section 4.2.1** Hazards Identified/Created by MWH: Notice of the hazards discussed in this section should also be communicated to Volpe, EPA or the lead H&S officer to ensure Volpe/EPA/CDM and removal contractors are aware of these hazards. There should be some level of formal communication about the activities that Volpe is performing on the mine property - hauling residential soils, traffic control, and communications. How with the MWH activities will be integrated with existing operations conducted on the mine road.
- Section 4.2.2** Hazards Identified/Created by third: Same as comment above.
- Section 5.1** Daily Tailgate meetings: Please indicated who is responsible for conducting, leading, logging these meeting.
- Section 7.2** Bears, mountain lions, and other or wild animals should be included as a site specific hazard

- Section 7.3** The terms "Mountainous Areas" and "Off Site Locations" are undefined and ambiguous. These terms should be defined or a map showing the boundaries included to avoid any confusion as to the location of these areas.
- Section 7.3.1** Cooler should be decontaminated as well as any equipment leaving the exclusion zone.
- Section 7.3.1** All clothing used under level C should become dedicated equipment: gloves, hats, long sleeve shirts, etc.
- Section 7.3.1** An explanation should be provided to explain why Level C is not required here; possibly move last paragraph of this section to beginning.
- Section 7.3.1** Include drill bit hazard mentioned in Section 7.3.2 - Suggest changing "scratches" to "injuries"
- Section 7.3.2** CDM is not familiar with use of hair spray as a surfactant or encapsulant. Has MWH prepared a justification supporting the use of hairspray as an encapsulant during decontamination activities?
- Section 7.3.3** SOP to Mitigate Hazards: Page 15: A statement should be included that no workers wearing tyvek will walk cross Highway 37 on foot (either coming or going to the flyway from the mine site).
- Section 8.1** PPE Requirements: CDM is unsure if level D with a half face respirator is adequate PPE for the bark samplers outside the mine area. CDM would recommend a negative exposure assessment to be sure this level of protection is appropriate. Has MWH considered the new info from Tony Ward at the University of Montana about finding Libby Amphibole in bark beyond the mine boundaries? How will bark samplers outside the mine area decon themselves if there is asbestos in the bark samples they collect?
- Section 8.1** If leather gloves are used "on site" they should be left in the exclusion zone and disposed of at the conclusion of work
- Section 8.1** CDM would recommend the use of water instead of hairspray on tyvek or removing the outer tyvek before and getting back in a vehicle.
- Section 8.1** Text should be added to indicate that P100 cartridges will be disposed of with tyvek during each personal decon
- Section 8.1 and 8.2** The "flyway" area is in an area outside of the current exclusion zone for OU3. When decon is performed in this area will decon water be collected and captured at a decon pad constructed at the "flyway"? The term "flyway" is not defined.

Section 8.2 CDM recommends the use of water during the removal of the outer tyvek layer.

Section 11.0 Emergency Contact Information: A contact for EPA/Volpe and the lead project H&S officer should be included

Section 11.0 The distance to the hospital should be included

General Questions:

How will vehicles be decontaminated when vehicles are finally brought off the mine site for return to rental agency or for other off-site use? CDM would recommend air filters be changes and a full interior and exterior decon be performed?

Will each sampling team include a person trained in first aid and CPR?